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*Counsel for Plaintiffs*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

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IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

MDL No. 3084 CRB

Honorable Charles R. Breyer

## This Document Relates to:

**MOTION TO WITHDRAW AS COUNSEL  
OF RECORD**

*T.C. vs. Uber Technologies, Inc., et al.,*  
3:25-cv-02109;

*A.D. vs. Uber Technologies, Inc., et al.,*  
3:25-cv-02111;

*A.W. vs. Uber Technologies, Inc., et al.,*  
3:25-cv-02401;

*T.B. vs. Uber Technologies, Inc., et al.,*  
3:25-cv-02678:

*A.G.L. vs. Uber Technologies, Inc., et al.,*  
*3:25-cv-02931:*

*S.D. vs. Uber Technologies, Inc., et al.,  
3:25-cv-03547:*

*T.W. vs. Uber Technologies, Inc., et al.,*  
3:25 cv 04414:

*A.G. vs. Uber Technologies, Inc., et al.,*  
3:25-cv-04802; and

*T.L. vs. Uber Technologies, Inc., et al.,*  
3:25-cv-04878

1 Pursuant to Local Rule 11-5, D. Douglas Grubbs of Pulaski Kherkher, PLLC, counsel  
2 of record (“Counsel”) for the above-referenced Plaintiffs, respectfully moves this Court for an  
3 Order allowing his firm to withdraw as counsel of record in the above-captioned matters.  
4

5 In response to Defendants’ show cause motion (ECF 3604), Counsel reviewed the  
6 alleged “non-bona-fide receipts” that Plaintiffs previously provided to Counsel. Relying on  
7 Defendants’ representations asserted in ECF 3604, its accompanying exhibits and sworn  
8 declarations, Counsel contacted the above-referenced Plaintiffs via email on July 31, 2025.  
9 Counsel informed Plaintiffs of Uber’s motion and requested that Plaintiffs provide any  
10 additional proof of their ride at issue, *e.g.*, the summary email that Uber typically sends upon  
11 ride completion. After his firm attempted calling the above-referenced Plaintiffs the week of  
12 August 4th, Counsel sent a follow-up email on August 11, 2025 as well as mailed letters via 2-  
13 day Federal Express giving Plaintiffs until August 22, 2025 to provide any additional proof  
14 otherwise Counsel would initiate the process of withdrawing as their attorneys. At the time of  
15 filing this motion to withdraw, no additional ride receipt proof has been provided by the above-  
16 referenced Plaintiffs nor substitute counsel identified.  
17

18 Additionally, during a meet and confer zoom on August 1, 2025 and email confirmation  
19 on August 4, 2025, Counsel advised opposing counsel at Shook, Hardy & Bacon as well as  
20 Kirkland & Ellis of his firm’s intent to withdraw should the above-referenced Plaintiffs fail to  
21 provide additional ride receipt proof. As required by Local Rule 11-5(a), Counsel has provided  
22 written notice of Counsel’s intent to withdraw, reasonably in advance, to the above-referenced  
23 Plaintiffs as well as opposing parties.  
24

25 WHEREFORE, the attorneys and law firm of Pulaski Kherkher, PLLC respectfully  
26 request that they be allowed to withdraw as counsel of record for the above-referenced Plaintiffs.  
27 A courtesy copy of this motion will be served upon Plaintiff at their last known address and via  
28 electronic mail.

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2 Dated: August 26, 2025

Respectfully submitted,

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5 **PULASKI KHERKHER, PLLC**

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/s/ D. Douglas Grubbs  
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(*Admitted Pro Hac Vice*)  
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Counsel for Plaintiffs

1                   **CERTIFICATE OF SERVICE**

2                   I hereby certify that on August 26, 2025, I electronically transmitted the foregoing MOTION  
3 TO WITHDRAW AS COUNSEL OF RECORD to the Clerk's office using the CM/ECF system for  
4 filing thereby transmitting a Notice of Electronic Filing to all CM/ECF registrants. Additionally, the  
5 foregoing was served on Defendants' counsel via email at: [ubermdlservice@listserv.shb.com](mailto:ubermdlservice@listserv.shb.com).  
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8                   */s/ D. Douglas Grubbs*  
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